

The Commission should not be diverted by the suggestion that implementation of number portability be delayed until a detailed cost analysis is performed.⁶⁵ These suggestions are based on unsubstantiated and possibly exaggerated cost estimates. GTE, for example, suggests that it would cost as much as \$1.65 billion to upgrade its network to support a permanent number portability solution.⁶⁶ However, because this estimate provides virtually no detail, it is not possible to determine whether GTE is incorporating into its cost estimates certain signaling, generic code, and AIN upgrades that it might otherwise undertake even in the absence of number portability. Such costs cannot fairly be attributed to number portability alone, but should be allocated among all of the various network functions and services that the upgrades support.

Moreover, as AT&T showed in its comments, the costs of number portability will surely represent only a small fraction of total network infrastructure investment⁶⁷ and will be incurred over time in discrete increments as portability solutions are deployed region-by-region. The

⁶⁵ See, e.g., Bell Atlantic, pp. 8-9.

⁶⁶ GTE, p. 14.

⁶⁷ AT&T, p. 33.

Commission can easily manage portability costs through an implementation schedule designed to reduce cost impacts on carriers. In addition, deployment in initial regions will provide accurate cost (and valuable operational and administrative) information before portability is extended nationwide. Costs should therefore present the Commission no greater concern than in the 800 services context, where it mandated deployment of number portability without first performing a detailed cost analysis.

"Phased" deployment will also enable the Commission to accommodate particular industry segments that may face unique or unusual issues in implementing number portability. AT&T recognizes that independent telephone companies⁶⁸ and a number of wireless carriers⁶⁹ may lack the resources necessary, or require more extensive network modifications than other carriers, to support number portability. An appropriate database solution, however, will allow the Commission initially to deploy number portability in specific regions -- and if necessary for specific services (i.e., wireline versus wireless) -- and to develop an implementation schedule that affords particular carriers sufficient time to meet industry standards, if

⁶⁸ See, e.g., NECA, p. 2; OPASTCO, pp. 4-6.

⁶⁹ See, e.g., AirTouch Paging, p. 14.

necessary.⁷⁰ Moreover, permanent database solutions such as LRN are designed to provide for correct call processing and routing until carriers lacking number portability capabilities can upgrade their networks to support them.⁷¹

AT&T believes that a permanent number portability solution should be made widely available to customers in 1997. Virtually all equipment vendors participating in the Illinois CC number portability workshop indicate that they can provide the upgrades necessary for LRN by the second quarter of 1997. These vendors may be able to deliver even sooner as specifications become more detailed.⁷² While AT&T understands that integration of upgrades into carrier networks will not be instantaneous, AT&T nonetheless believes that with delivery in early 1997, deployment of a permanent solution in a number of specific regions can be

⁷⁰ A number of commenters suggest that number portability first be made available in the 100 top MSAs. This would appear to be a reasonable conceptual starting point for "phased" deployment. The Commission may also wish to consider the circumstances of wireless carriers within the "start-up" areas in establishing number portability timelines.

⁷¹ In the case of LRN, a "non-portability" carrier will deliver a call to a designated switch of a "portability" carrier in the same serving area.

⁷² A single vendor indicated that it could commit only to providing necessary upgrades by the second quarter of 1998. This vendor too indicated that it may be able to substantially accelerate delivery as specifications become more definite.

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completed by the end of that year. The Commission should therefore ensure that a permanent solution is made operational in several regions by the close of 1997 as the first stage of a phased, national deployment of number portability.⁷³


CONCLUSION

For the reasons stated above, the Commission should select and deploy interim database and permanent number portability solutions as soon as possible.

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⁷³ The Commission can facilitate implementation of the permanent solution by ensuring deployment of an interim database solution in regional trials in 1996, as described in Section II.

APPENDIX A

Parties Filing Comments

<u>Name</u>	<u>Abbreviation</u>
Ad Hoc Coalition of Competitive Carriers	Ad Hoc Coalition
AirTouch Paging, Arch Communications Group, Inc.	Air Touch Paging
America's Carriers Telecommunications Association	ACTA
Ameritech Operating Companies	Ameritech
Association for Local Telecommunications Services	ALTS
Association of Public Safety Communications Officials	APSCO
AT&T	AT&T
Bell Atlantic	Bell Atlantic
Bell Atlantic NYNEX Mobile, Inc.	Bell Atlantic/NYNEX
BellSouth Corporation	BellSouth
California Cable Television Association	CCTA
California (People and State of), California Public Utility Commission	CA PUC CPUC
Cellular Telecommunications Industry Association	CTIA
Cincinnati Bell Telephone	CBT
Competitive Telecommunications Association	CompTel
Ericsson Corporation	Ericsson
Florida Public Service Commission	Florida PSC
General Communications, Inc.	GCI
General Services Administration	GSA
GO Communications Corporation	GO
GTE Service Corporation	GTE
GVNW Inc. Management	GVNW
Independent Telecommunications Networks, Inc.	ITN
Interactive Services Association	ISA
Jones Intercable, Inc.	Jones Intercable
David L. Kahn	Kahn
LDDS Worldcom	LDDS
MCI Telecommunications Corporation	MCI
Microwave Telecommunications Corp.	MTC
MFS Communications Company, Inc.	MFS
National Association of Regulatory Utility Commissioners	NARUC
National Emergency Number Association	NENA
National Exchange Carrier Association	NECA
National Telephone Cooperative Association	NTCA
National Wireless Resellers Association	NWRA
New York State Department of Public Service	NYDPS
Nextel Communications Incorporated	Nextel
NYNEX Telephone Companies	NYNEX
Ohio Public Utilities Commission	Ohio PUC
Omnipoint Corporation	Omnipoint
Organization for the Protection and Advancement of Small Telephone Companies	OPASTCO
Pacific Bell and Nevada Bell	PacBell
Paging Network	Paging Network
Personal Communications Industry Association	PCIA
PCS PrimeCo, L.P.	PCS PrimeCo

Southwestern Bell Communications
Scherers Communications Group, Inc.
Sprint Corporation
TDS Telecom
Telecommunications Resellers Association
Telemation International, Inc.
Teleport Communications Group, Inc.
Teleservices Industry Association
Texas Advisory Commission on State Emergency
Communications
Texas Public Utility Commission
Time Warner Communications Holding Inc.
US Airwaves Inc.
US Intelco Networks Inc
US Small Business Administration
US West Communications Inc
United States Telephone Association
Yellow Pages Publishers Association

SBC
Scherers
Sprint
TDS
TRA
Telemation
TCG
TIA
TX ACSEC

Texas PUC
TWCOMM
US Airwaves
US Intelco
SBA
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YPPA

CERTIFICATE OF SERVICE

I, Ann Marie Abrahamson, do hereby certify that on this 12th day of October, 1995, a copy of the foregoing Reply Comments of AT&T Corp. was mailed by U.S. first class mail, postage prepaid, to the parties listed on the attached.


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